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8 UNITED STATES DISTRICT COURT  
9 DISTRICT OF NEVADA, SOUTHERN DIVISION

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11 GINA CASTRONOVO-FLIHAN,  
12 Plaintiff,  
13 vs.  
14 STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY, a foreign  
15 company; AND DOES I through V, inclusive  
16 Defendants.

CASE NO. 2:20-cv-1197-JCM-DJA

**PROPOSED STIPULATION AND ORDER  
TO EXTEND TIME FOR THE PARTIES  
TO FILE THE JOINT PRE-TRIAL  
ORDER**

**(SECOND REQUEST)**

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18 Plaintiff GINA CASTRONOVO-FLIHAN (“Plaintiff”), by and through her undersigned  
19 counsel of record, and Defendant STATE FARM MUTUAL AUTOMOBILE INSURANCE  
20 COMPANY (“Defendant”), by and through its undersigned counsel of record, hereby stipulate and  
21 agree, subject to the Court’s approval, as follows:

22 1. On September 22, 2023, this Court entered an Order [40] Granting Motion for  
23 Partial Summary Judgment. (ECF No. 54).

24 2. On October 19, 2023, Plaintiff and Defendant conducted a meet and confer to  
25 discuss the Joint Pre-Trial Order.

26 3. The parties have been working diligently and have held a thorough meet and confer  
27 to discuss the Joint Pre-Trial Order. However, there are certain issues the parties are negotiating  
28 that will likely not be completed, insofar as verbiage on the contentions and discussions for exhibits

1 or factual stipulations, by the current due date of the Joint Pre-Trial Order on October 25, 2023.

2 4. On October 26, 2023, this court entered an Order [58] extending time for the parties  
3 to file the Joint Pre-Trial Order.

4 5. The parties have completed a first working draft of the proposed Joint Pre-Trial  
5 Order, following their meet and confer.

6 6. Plaintiff has provided a revised draft for Defendant review. Based on the length and  
7 scope of additions, Defense counsel requires a brief enlargement of time to review the latest version  
8 with client and to finalize for submission to Court.

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7. The parties agreed to extend the due date of the Joint Pre-Trial Order by ten (10) days inclusive of the current due date of November 8, 2023 to November 17, 2023.

DATED this 8<sup>th</sup> day of November, 2023.

**MCMENEMY | INJURY LAW PLLC**

/s/ Ian M. McMenemy

IAN M. MCMENEMY

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*Attorney for Plaintiff*

GINA ČÁSTRONŮVO-FLIHAN

DATED this 8<sup>th</sup> day of November, 2023.

**LEWIS BRISBOIS BISGAARD &  
SMITH LLP**

/s/ Frank A. Toddre, II

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STATE FARM MUTUAL AUTOMOBILE  
INSURANCE COMPANY

## ORDER

By agreement of the parties, the due date of the Joint Pre-Trial Order shall be extended by a period of two weeks from November 8, 2023 to November 22, 2023.

**IT IS SO ORDERED.**

DATED this 9<sup>th</sup> day of November, 2023:

  
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DANIEL J. ALBREGTS  
UNITED STATES MAGISTRATE JUDGE